

August 3, 2001

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: Verizon's Alternative Regulation Plan, D.T.E. 01-31

Dear Ms. Cottrell:

Enclosed for filing please find the Attorney General's Third Set of Document and Information Requests to Verizon Massachusetts, AG-VZ-3-1 to 3-28, together with a Certificate of Service in the above-referenced proceeding.

Sincerely,

Karlen J. Reed
Assistant Attorney General
Utilities Division
200 Portland Street, 4th Floor
Boston, MA 02114
(617) 727-2200

KJR/kr

Enc.

cc: D.T.E. 01-31 Service List (w/enc.)

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department of Telecommunications and Energy on)		
its own Motion into the Appropriate Regulatory Plan to succeed Price Cap)		
Regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts')		D.T.E. 01-31
intrastate retail telecommunications services in the Commonwealth)		
of Massachusetts)		

**ATTORNEY GENERAL'S
THIRD SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Verizon New England d/b/a Verizon Massachusetts ("Verizon MA" or "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests within 10 calendar days from receipt of request, as per the Hearing Officer's Ground Rules issued May 7, 2001.

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**ATTORNEY GENERAL'S
THIRD SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

AG-VZ-3-1 Please provide the following information:

- a. Documents, correspondence, memoranda, business plans, marketing plans, forecasts, sales targets, and any and all other written materials including electronic as well as conventional paper correspondence and documents pertaining to the sales and marketing activities being and/or to be carried out jointly between Verizon MA and Verizon Long Distance (VLD) on behalf of or for the benefit of VLD with respect to the acquisition of residential and small business customers for interLATA long distance services offered by VLD.
- b. The number, or an estimate of this number if an actual is not available, of inbound calls received by all Verizon MA customer service functions (including but not limited to customer service, billing, and repair representatives) from its customers during the calendar years 1999, 2000, and an estimated number for 2001.
- c. The number of VLD Massachusetts customers obtained to date.
- d. The estimated percentage of VLD customers that will be obtained via Verizon MA through joint marketing of local and long distance service, in the first and fifth years following VLD's receipt of authorization to provide long distance service in Massachusetts.
- e. The number of Verizon MA customer service representatives employed by Verizon MA on January 1, 2001 and the number of customer service representatives planned to be employed as of January 1, 2002. Please also provide planning materials relied on to arrive at the budgeted headcount.

- f. Describe and provide all materials used for training Verizon MA customer service representatives to handle VLD service inquiries and orders for long distance service.
- g. Describe and provide all documents pertaining to the manner in which the costs of Verizon MA's participation in joint marketing with VLD will be identified and allocated to VLD. Indicate specifically how such costs are to be tracked, how common overhead costs will be allocated, and the specific accounting transactions or payment mechanisms that will be used to compensate Verizon MA for any and all sales, marketing or other services it furnishes to VLD.

AG-VZ-3-2 Please provide copies of all marketing scripts that Verizon MA representatives are using and/or will use to joint market local and long distance services. For each script, identify the customer category for which it is/will be used. For purposes of example only and not to limit the response to these categories, this would include scripts for (i) marketing to new customers calling to subscribe to local exchange service, (ii) marketing to existing customers calling to change or add a service, (iii) marketing to existing customers calling to change their long distance service, (iv) marketing to existing customers calling with service or billing inquiries, and (v) marketing to customers calling with a service trouble report or inquiry.

AG-VZ-3-3 Please provide all copies of all marketing scripts used by Verizon-New York representatives to joint market the long distance services of Verizon-New York and Verizon Long Distance in New York. For each script, identify the customer category for which it will be used, as described in AG-VZ-3-2, above.

AG-VZ-3-4 Please provide copies of all written materials (including materials published on a website) that Verizon MA currently or plans to make available to callers in response to any inquiry regarding long distance service, and identify the individuals, including their title and company, that supervised the creation of the written materials and the company, Verizon MA, VLD, or any other Verizon affiliate, that paid for the production of the written materials.

AG-VZ-3-5 Please provide drafts of all current and planned television and radio advertising of VLD services by either Verizon MA or VLD; identify the broadcast stations that will air the advertisements and indicate which company, Verizon MA or VLD, has purchased or will purchase the air time for the advertisements and the total dollar amount budgeted for broadcast advertising.

AG-VZ-3-6 Please provide copies of all scripts, instructions, and other materials that are or that are planned to be used by Verizon MA representatives to respond to requests for VLD

services by potential customers who subscribe to a local exchange carrier other than Verizon MA.

AG-VZ-3-7 Please identify all local exchange carriers in Massachusetts other than Verizon MA from which VLD intends to or already has agreed to purchase switched carrier access services, and specify precisely what types of switched access services will be purchased from each such carrier.

AG-VZ-3-8 Please provide copies, both draft and final versions, of scripts and all related materials that Verizon MA representatives use or will use to seek permission to use a caller's "CPNI" for purposes of marketing VLD services.

AG-VZ-3-9 Please provide the following information:

- a. The compensation to be paid to Verizon MA for each sale of VLD service by a Verizon MA representative.
- b. The compensation to be paid to a Verizon MA representative for each sale of VLD service by that representative. Please specify whether the compensation received by individual representatives is in the form of money, other goods and services, or other in-kind compensation.
- c. Explain how the sales of VLD services by Verizon MA representatives will be monitored and tabulated by Verizon MA, and how individual Verizon MA representative's sales of VLD services will be monitored for compensation purposes.

AG-VZ-3-10 Please provide copies of the draft and final notices of VLD services that will appear in the Customer Guide section of Verizon MA's White Page Directories. Please provide the expected publication dates of all White Pages Directories where the notices will appear.

AG-VZ-3-11 Please provide estimates of VLD's expected share of the Massachusetts long distance market, by both number of customers and revenue, at the end of the first and fifth years of operation and include with this response all documentation supporting the calculation of these estimates, including but not limited to all documents, studies, and information relied on, the identification of any consultant or other third party retained to provide input, prepare the estimates, or otherwise participate in the calculation of the estimate, and any product prepared by the consultant or third party in this regard.

AG-VZ-3-12 a. Will VLD provide long distance service to CLEC local service business

customers and will VLD will provide long distance service to CLEC local service residential customers?

- b. To the extent not provided in response to 1(a), describe with specificity the manner in which VLD will market and sell long distance services to customers of CLECs.

AG-VZ-3-13 a. In New York, does VLD provide long distance services to customers of local exchange carriers other than Verizon-New York, how many of VLD's New York customers currently obtain their *local exchange service* from a carrier other than VLD?

- b. Does VLD provide long distance service in New York to customers served by independent (*i.e.*, non-Verizon) incumbent local exchange carriers and if so indicate which ILEC customers are being offered VLD service.

AG-VZ-3-14 For each month since the Federal Communications Commission authorized VLD to provide in-region long distance services in New York, please provide separately the number of Verizon-New York customers and the number of all other customers that subscribed to VLD's long distance service during that month and state whether the customer was obtained through joint marketing by Verizon-NY on behalf of VLD or through some other marketing channel. For those customers obtained via joint marketing by Verizon-NY, identify the purpose for the customers' original contact with Verizon-NY, for example but not limited to (i) calling to subscribe to local exchange service, (ii) calling to change the long distance carrier, (iii) calling to order a modification or addition to local service, or (iv) calling to report to a service problem.

AG-VZ-3-15 Please provide copies of all documents, including scripts used by Verizon MA's customer service representatives, used by Verizon MA to joint market services provided by any of its affiliates, including but not limited to Verizon Advanced Data, Inc., Verizon On-Line Internet, and Verizon Wireless.

AG-VZ-3-16 Please provide copies of all Verizon MA employee guidelines, practices and policies pertaining to the solicitation of customers who have changed their service provider from Verizon MA to a CLEC in an attempt to "win-back" such customers to Verizon MA.

AG-VZ-3-17 Please provide copies of all standard form "win-back" correspondence or promotional materials used by Verizon MA to solicit customers who have changed their service provider from Verizon MA to a CLEC.

AG-VZ-3-18 How does Verizon MA obtain information that an existing Verizon MA customer has

changed local service provider from Verizon MA to a CLEC? How long after this information is first obtained by Verizon MA is it made available to Verizon MA sales and marketing personnel for purposes of initiating a "win-back" effort or for any other purpose?

AG-VZ-3-19 For each month beginning in January 2000 and through the most recent period for which data is available, please provide the following information:

- a. The number of residential subscribers who have changed service provider from Verizon MA to a CLEC.
- b. The number of residential subscribers who have changed service provider from Verizon MA to a CLEC who are contacted by Verizon MA in an effort to "win them back" to Verizon MA.
- c. The number of residential subscribers who have received some form of "win-back" contact who return to Verizon MA within 30 days of receiving such contact.
- d. The compensation that is paid to a Verizon MA representative for each successful "win-back" of a residential customer by that representative. Please specify whether the compensation received by individual representatives is in the form of money, other goods and services, or other in-kind compensation.
- e. The number of business subscribers who have changed their service providers from Verizon MA to a CLEC.
- f. The number of business subscribers who have changed their service providers from Verizon MA to a CLEC who are contacted by Verizon MA in an effort to "win them back" to Verizon MA.
- g. The number of business subscribers who have received some form of "win-back" contact who return to Verizon MA within 30 days of receiving such contact.
- h. The compensation that is paid to a Verizon MA representative for each successful "win-back" of a business customer by that representative. Please specify whether the compensation received by individual representatives is in the form of money, other goods and services, or other in-kind compensation.

AG-VZ-3-20 Has Verizon MA undertaken any quantitative studies regarding supply elasticities of

CLECs operating in New Jersey (a) with respect to CLECs that only resell bundled Verizon MA services; (b) with respect to CLECs that provide resold services based solely upon VNJ UNE-P or other UNE arrangement with no CLEC facilities; (c) with respect to CLECs that utilize UNE-loops in conjunction with CLEC-owned switching equipment; and (d) with respect to CLECs that own their own outside plant distribution and/or transport facilities? Please provide complete copies of any and all such studies, identifying in each case the source of the information upon which Verizon MA has relied in reaching its findings.

AG-VZ-3-21 Please refer to the Verizon MA response to AG-VZ-1-11. Items (e), (j) and (o) request "the *number* of missed installation *dates*" (emphasis supplied) whereas the response is captioned "% Missed Installation *Appt*" (emphasis supplied). By way of clarification, by "missed installation dates" the AG-VZ-1-11 was referring to missed dates as the install date had been quoted at the time that Verizon MA received the order for the service (based either upon a standard installation interval or a specific installation date quoted by the Company).

- a. Please confirm that "Appt" which we take to mean "appointments" refers to the installation date quoted or expected (based upon standard intervals) as of the date of the original order, rather than an "appointment" made subsequent to the date of the original order for the specific customer premises visit by the Verizon MA craftsman.
- b. Please indicate whether "Appt" is the same as "FOC" (Firm Order Commitment) or something else. If these terms are different, please define each as regularly used by the Company.
- c. If there is a difference between "missed installation dates" and "missed installation appt," provide the data for "missed installation dates."
- d. If there is a difference between "missed FOC dates" and "missed installation appt," provide the data for "missed FOC dates."
- e. AG-VZ-1-11 requested the *number* of missed installation dates; the respect provided *percentages*. Please provide the actual numbers as requested.
- f. For each of the three categories of T-1 services addressed in AG-VZ-1-11 (*viz.*, Flexpath T-1, IntraLATA Special Access T-1, UNE T-1), provide a detailed step-by-step description of the processes undertaken by Verizon MA from and including the receipt of the original order for service (either from the end user in the case of Flexpath or from a carrier in the case of special access

or UNE) through and including the installation, testing and final acceptance of the service at the premises at which it is installed. Indicate for each process the "standard" point in the order cycle (i.e., days from original receipt of order) at which the activity is supposed to take place, and indicate, for each of the months for which data is provided in response to AG-VZ-1-11, the average point in the order cycle at which each of the specified activities actually took place.

AG-VZ-3-22 The following questions are in reference to the attached letter ("Attachment A") appearing on the Verizon.com website: "DS1 and DS3 Unbundled Network Elements Policy", July 24, 2001 (downloaded on August 1, 2001 from http://www22.verizon.com/wholesale/frames/generic_frame_east/0,2656,industry_letter_s,00.html).

- a. The letter states (para. 2) that "... Verizon is not obligated to construct new Unbundled Network Elements where such network facilities have not already been deployed for Verizon's use in providing service to its wholesale and retail customers." Please provide a citation to whatever legal authority Verizon relies upon to support that statement.
- b. The letter states (para. 2): "Moreover, although Verizon has no legal obligation to add DS1/DS3 electronics to available wire or fiber facilities to fill a CLEC order for an unbundled DS1/DS3 network element..." Please provide a citation to whatever legal authority Verizon relies upon to support that statement.
- c. Does Verizon MA believe that the statements referenced in parts a. and b. above apply to its operations in Massachusetts? If the answer is anything other than an unqualified yes, explain in detail how its legal obligations in Massachusetts differ from those holding in other states, relative to each of these statements.
- d. Has Verizon or Verizon MA ever issued a statement or document concerning its obligations and policies concerning the construction of new DS1 and/or DS3 facilities for the provision of retail services, including but not necessarily limited to Flexpath T-1 exchange access lines/trunks? If such a statement or document has been issued, please provide a copy of that statement or document.
- e. If the response to d. is that no such statement or document has been issued, please provide any internal Verizon or Verizon MA practices pertaining to the provisioning of retail DS1/DS3 services including but not limited to Flexpath T-

1 exchange access lines/trunks in situations where facilities are not initially available to fulfill the order. If not such written practice or practices exist, provide a statement, corresponding to the one from the Verizon website cited above, describing Verizon MA's practices with respect to the construction of facilities required in order to fulfill a retail order.

AG-VZ-3-23 Please provide the following information in the same format as Verizon used in preparing its response to AG-VZ-1-11. For each month beginning in January 2000 and extending to the most recent month for which data is available, provide the following information.

- a. The total number of orders for Flexpath T-1 exchange access lines/trunks that were rejected due to a determination by Verizon MA that facilities were not available.
- b. The total number of orders for T-1 intraLATA Special Access lines that were rejected due to a determination by Verizon MA that facilities were not available.
- c. The total number of orders for T-1 UNEs that were rejected due to a determination by Verizon MA that facilities were not available.

AG-VZ-3-24 Please provide the same information as requested in AG-VZ-3-24 on a wire center basis.

AG-VZ-3-25 Please provide any written practice(s) or, if no such practice exists, provide a narrative explaining Verizon MA's practices and policies relative to the rearrangement and reuse of existing facilities when facilities are initially unavailable at a particular customer location to fulfill an order for a service requiring a T-1 facility. Indicate whether the same or different practices apply in the case of retail service orders placed by end users, orders for special access placed by carriers, or orders for T-1 UNEs placed by carriers, including Flexpath T-1, IntraLATA Special Access T-1, and UNE T-1. In your response, please address the following circumstances:

- a. The T-1 common equipment has no spare ports/slots, but one or more of the ports/slots is assigned to a circuit that is no longer in use because service has been discontinued. Under the Company's applicable policies and procedures, could the technician reuse such a port/slot in order to fulfill the new order? Describe any differences that might occur as between orders for Flexpath T-1, IntraLATA Special Access T-1, and UNE T-1.

- b. There is no unassigned T-1 copper or fiber distribution facility available to fulfill the order, but one or more T-1 distribution facilities along the route passing the customer location is assigned to a circuit that formerly served a customer at a nearby location, but is no longer in use because that service had been discontinued. Under the Company's applicable policies and procedures, could the technician reuse such a distribution facility in order to fulfill the new order? Describe any differences that might occur as between orders for Flexpath T-1, IntraLATA Special Access T-1, and UNE T-1.

AG-VZ-3-26 Please identify and provide copies of all documents that provide guidelines to Verizon MA outside plant technicians concerning the Company's policies and procedures for rearrangement and/or reuse of facilities to provide any of the three categories of T-1 service listed in the previous request.

AG-VZ-3-27 Please describe the procedures Verizon New Media Services, Inc. ("VNMS") (the Verizon subsidiary that publishes Verizon MA's phone books), and Verizon MA follows (or would follow) assuming that a CLEC requested Verizon MA to have the CLEC business customer's street address unpublished, while having the customer's name and phone number published. How would Verizon MA and VNMS:

- a. Confirm to the CLEC receipt of the CLEC's order as stated above?
- b. Process the CLEC request?
- c. Correct the CLEC customer's listing in Verizon MA's directories if the CLEC customer's street address is published?
- d. Resolve a complaint from the CLEC and the CLEC's customer if Verizon MA publishes the street address contrary to the CLEC request order?

AG-VZ-3-28 How many phone directories did VNMS publish last year in Massachusetts?

ATTACHMENT A

VERIZON DS1 AND DS3 UNBUNDLED NETWORKS ELEMENTS POLICY

**THE COMMONWEALTH OF MASSACHUSETTS
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of Massachusetts))	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding by either hand delivery, mail, and/or e-mail.

Dated at Boston this 3rd day of August 2001.

Karlen J. Reed
Assistant Attorney General
Regulated Industries Division
200 Portland Street, 4th Floor
Boston, MA 02114
(617) 727-2200